

Background Information:

This document includes King County Parks (KC Parks) SEPA Responsible Official responses to 3 comments from 3 individuals plus 1 agency comment letter from City of Kent Public Works. The 5 comment documents result from a public notice period inviting public comments during an advertised, posted 21-day comment period ending in mid-May, 2013.

Two comment documents were submitted nearby residents (labeled Rock Creek Ranch Resident #1 & #2 below). Both parties submitted one or more comments during the first public comment period. One comment is made by a Covington area resident. The Rock Creek Ranch Resident #1 provided a lengthy comment document. The second part refers to 15 comments intended as second round comments to prior responses to his prior comments (3 comment documents submitted during and after the first 21 day comment period). The 3 part response below to Rock Creek Ranch Resident #1 appears first. The City of Kent comment letter appears as the last document.

Public Comment – Rock Creek Ranch Resident #1 (Part 1 of 3)	Community Planning Response	SEPA Responsible Official – Technical Response to Comments	
<p>Background and Context</p> <p>I am starting my public comment with background relative to my expectations of comment analysis. Any comments disposed by King County Parks as speculative related to expected performance of Ravensdale Phase 2 implementation outcomes should be judged based upon King County’s performance record of Phase 1 completion and historical fair process handling of “Community Adopted” master plan & SEPA review artifact accuracy. My opinion is that King County Parks has demonstrated a pattern of disregard for any information that is not supportive to development projects sponsored by Parks. Additionally the processes pursued clearly appear to manage artifact accuracy in support of King County’s favor.</p>	<p>The Ravensdale Master Plan was negotiated, developed, and adopted by a strong majority of stakeholders and the community at large over an 18 month community planning process. The plan represents a community supported balance between active recreation, passive recreation, and rural character. For more information and a video outlining the process please visit:</p> <p>http://www.greatermaplevalleyareacouncil.org/ravensdale.html</p> <p>All environmental, engineering, and technical requirements of the project are either already addressed or will be finalized via King County Department of Permitting and Environmental Review and any mitigations required by DEPR or SEPA.</p>	<p>Noted.</p> <p>Generally, King County Parks respectfully disagrees with all assertions of lack of fair process, lack of document adequacy, disregard for information, and artifact accuracy. KC Parks in the capacity of SEPA Responsible Agency and Responsible Official has fully considered all public comments on the Phase 2 sport field proposal resulting from 42 days of public comments under 2 advertised public notifications (newspaper notice, mailings, sign posting). The second 21-day comment period was provided largely in direct response to the comment writer’s timely comments during first comment period, his comments received after the close of the first comment period, plus his comments during the second public notice period. Ample opportunity and documentation about proposal scope has been afforded for comments plus full consideration of all submitted information, including all submitted comments.</p> <p>King County Parks is not the Applicant or the Proposal Sponsor of Phase 2 sport fields, the proposal under SEPA Review.</p>	

Public Comment – Rock Creek Ranch Resident #1 (Part 1 of 3)	Community Planning Response	SEPA Responsible Official – Technical Response to Comments	
<p>The Phase 1 Park Development project was not completed. The aspects of permitted plans associated with invasive species removal, buffer planting intended to mitigate impacts to neighbors, and removal of construction access / restoration were not accomplished. King County Park’s failure to complete projects “as planned in permitted artifacts” re-enforces the “low trust” relationships with rural community that has been fostered through previous process participation related to Ravensdale Park Development.</p>	<p>The Ravensdale Master Plan, as developed and adopted by the community will be an ongoing project for several years. Currently underway is the community meadow. Later this year the community will start work on the picnic shelters and trail features.</p> <p>The project is being led by the community via the Ravensdale Park Foundation as resources and fundraising allow. This is not a typical King County Parks capital project. The Ravensdale Park foundation consists of Ravensdale park stakeholders which include ballfield users and supporters of rural park features (community meadow, picnic shelter, trails, etc)</p>	<p>Phase 1 Clearing & Grading Permit issued in 2011 has been completed, inspected and closed out by KC Permitting.</p> <p>However, the rock access pad installed in Phase 1 remains in place at the site for reuse for Phase 2 proposal. (This same point was also clarified during the first public comment period)</p> <p>The conclusions reached by comment writer about King County and community relations are individual opinions. The comment letter is signed as a Rock Creek Resident, not formally representing the entire rural community.</p>	
<p>The “Community Adopted” master plan that King County Parks touts so frequently had initially included input from rural residents in 2007-2008. Since then the “Community Plan Steward” has been documented as the “League Sport Interest formalized as Ravensdale Park Foundation LLC” that had participated as one counterparty in negotiation of originally adopted plan. Since that original plan was adopted, numerous revisions have been implemented to the plan compromising community sponsored features in favor of higher area usage for league sports fields. The modification to “Master Plan” have been included without fair process to include rural residents in change decisions. Modifications to original plans include size increase in planned fields in west parcel (phase 2 fields have been expanded to support soccer fields in baseball outfields), Increased parking (Original plan by Jones & Jones 3/2008 provided for 90 parking spaces + 3250 sq. ft. drive as opposed to current 151 spaces in west field lot with more than 3 times surface callout of original). All of these modifications have been made at the expense of “Elk Meadow” originally sized at approximately 4 acres.</p>	<p>The Ravensdale Park Foundation is an open membership community stakeholder group that serves as the steward of the Master Plan on behalf of the community. It’s membership and advisory group includes ballfield users AND rural park advocates. The RPF is currently managing the community’s meadow project and will be managing the construction of the community picnic shelters later this year.</p> <p>The fields were re-oriented in order to accommodate multi-use (soccer and baseball) and provide an opportunity for the ballfield community to combine their resources to complete the fields.</p> <p>Parking requirements are ultimately driven by the Department of Permitting and Environmental Review. In addition to permitting requirements, there was a lot of concern from the immediate neighbors about parking adequacy. The plan ensures adequate parking.</p> <p>The master plan adds a large grassy community meadow providing a much larger area for elk to roam.</p> <p>In addition, Ravensdale Park is a single component of a much larger open space plan whereby surrounding areas and buffer were preserved by concentrating community recreation at this site.</p>	<p>The comment asserts the park site master plan process well reported as a controversial community process (Source: Seattle-Times, April, 2007).</p> <p>Master Plan modifications or revisions are not at issue in the SEPA Review of Phase 2 proposal. The comment writer does not have a sole right to review, to accept or to reject modifications that may or may have not been incorporated into the adopted master plan. During the SEPA Review, it has been determined by KC Parks that the subject proposal implements and conforms to the master plan.</p> <p>For clarification, “Original plans” in the comment are asserted to be the master plan dated 3/2008 compared to Phase 2 proposal site plan attached to SEPA Checklist. First, the comment questions validity of the master plan (process and content). Second, the comment asserts strict conformity with the master plan should be applied to Phase 2, with a conclusion that Phase 2 does not conform. The first assertion is not a SEPA matter. The second assertion is not supported by KC Park’s comparison of the two site plans. KC Parks asserts Phase 2 implements the master plan.</p> <p>Parking at 90 spaces in master plan was compared to 151 spaces in Phase 2. The difference lacks a distinction in the SEPA comment. The master plan report does not establish any</p>	

		<p>maximum number of parking spaces and SEPA impacts are not addressed by the comment.</p> <p>KC Parks disagrees with the assertion about size of Elk Meadow feature shown in 3/2008 Master Plan compared to Phase 2 (the proposal). The elk meadow total area is larger than 4 acres as shown in Phase 2 site plan when scaled. The difference lacks a distinction as to exact minimum size required for elk meadow. Regardless of exact size, resulting SEPA impacts (positive or negative) are not specified in the comment. The elk meadow is also the subject of other comments below.</p>	
<p>The SEPA checklist still does not accurately represent project and “face into” environmental issues being put forth. I certainly understand the reluctance to document the “pollution source” characteristics of synthetic sports fields as they relate to Critical Aquifer designation but this must be addressed. That I have provided feedback on 2 previous SEPA artifact reviews related to key aspects of Ravensdale Park project that are still mis-represented in this document set is regrettably lacking in apparent diligence. The following are provided as corrections & clarifications to SEPA artifact again (maybe 3rd time will be charm).</p>	<p>The 2009 King County Surface Water Design Manual recognizes synthetic sportsfields as a pollution generating source and was updated accordingly. The proposal will comply with the 2009 SWDM and required treatment will be included in the design.</p>	<p>The assertion of an inaccurate SEPA Checklist is not supported by a review of the 15 specific comments already made in the first comment period, followed by the responses from KC Parks, clarifications made by the Applicant, and a second round of comments on 15 subjects. See next table below.</p> <p>All environmental information now in the record serves to better inform the public and decision makers about the proposal, the basic available information and impacts of the proposal, including providing unavoidable impacts, as well as better illustrating the fully mitigated impacts included. Speculative impacts and unknown information do not create probable, adverse or significant impacts. The full record including the Applicant’s proposal as clarified was fully considered. The 15 comments below served to better inform the SEPA Responsible Official in reaching the conclusion after the first and second public comment period - issuance of a DNS for the proposal.</p>	

SEPA Checklist Reference	Phase 2 Proposal SEPA Checklist Revised 4-16-13	SEPA Public Comment / Correction Provided by Rock Creek Resident #1 (Part 2 of 3)	SEPA Responsible Official Response
Section A- Background , Question 11 – Description of proposal	Response refers to Park as “Ravensdale Regional Park”	Should read Ravensdale Park. This erroneous naming indicates applicants and King County’s desired future use of “rural park”. Unlike nearby outdoor Regional Shooting Park which is clearly an activity suited for rural placement , Ravensdale Park is rural park intended by law (Comprehensive Plan R-201, R-324) to serve local rural residents.	Noted. The Ravensdale Shooting Park is separate proposal that remained under review for 10 years as a separate review as a controversial proposal (Sources: Exec Dir., KC Permitting, Dec. 2012, news articles). The classification “Regional Park” does apply to Ravensdale Park based on standards for park planning, site size and text in the master plan report, whether part of the official park name, or not. See also response to comment below on comprehensive plan policy.
Section A- Background , Question 12 - Location	Response has discussion of 14 Acre of 47 Acre Ravensdale Regional Park.	Again Park Name should be corrected. 14 Acres answer is confusing. 2 Parcels are affected. 252206-9012 is 20 Acre Parcel for proposed field and parking lot construction. 362206-9019 is 12.32 Acre Parcel with proposed addition to northern parking.	Noted. There is basis in SEPA to consider the entire park property managed as one park site. The obvious reason to list all parcels is to enable the SEPA proposal to match the same limits of the master plan. The comment makes a minor distinction that makes no difference to the outcome of the SEPA review, or to the conclusions reached by SEPA Responsible Official about the 2 parcels with proposal features.
Section B – Environmental Elements, 1 - Earth , g. About what percent of site will be covered with impervious surfaces.	Response discusses 10 Acre site (As opposed to 14 acre above). This is assumed as western half of 20 Acre parcel 252206-9012. Information Provided discusses 10% parking / driveway (1 acre) and 50% for sports fields (5acre) totaling 60%?.	Phase 2 Drainage Design artifact provides impervious surface area call outs of 65402 sq. ft . (1.501 Acres) for parking / driveway and 280,000 sq. ft (6.428 Acres) for sports fields. This does not include sidewalks or restroom building. If building 10 acre site is used to estimate impervious surface, 15% driveway and over 64% for fields totaling >79% not including sidewalks / restrooms. Note - If Parcel were to be favored in estimate calculation, addition 2.5 acres of impervious sports fields should be added for Phase 1 fields, summing to total of(2.5+6.428+1.501=) 10.429 Acre impervious (not including walks / restroom) of 20 Acre parcel or 52% of total.	Storm water review is not a matter that can be resolved during the SEPA review, or finally resolved by the SEPA Responsible Official. King County Permitting staff will review and analyze the storm water data and site tabulations, whether 79% of 10 acres, or 52% of 20 acres, or other percent and site size basis as code requires for proper impervious coverage calculation. If the requirement applies as the comment asserts, then compliance will be provided by Applicant for the proposal, to the satisfaction of KC Permitting staff.
Section B – Environmental Elements, 3 – Water, b. Ground , 2. Describe waste material that will be discharged into ground.	The SEPA Checklist documents no discharges. It discussed “future proposal” that may include septic.	The Notice of Application & Request for Public Comment clearly describes “a prefabricated restroom structure with utility connections”. Does this restroom facility not require septic system? Septic design and associated drain field and reserve area need to be accounted for in analysis of this proposal.	The comment makes a minor distinction that makes no difference to the overall SEPA review, or the conclusion reached by SEPA Responsible Official about the proposal. No prohibition on septic exists at the subject site. The comment speculates on whether a septic design can be permitted. However, the Applicant may rely on the presumption of validity that a septic drain field designed to meet applicable permits creates no adverse impacts. The SEPA Responsible Official is entitled to rely on Applicant’s representation and the code during SEPA Review. Septic facility sizing can be inferred from site parking, attendance in TIA report disclosed in SEPA application plus applicable state and county regulations.

Section B – Environmental Elements, 3 – Water, c. Water runoff (including stormwater) , 1. Describe source of runoff	Answer describes storm water collection and cartridge filtering system. Also calls out 100% infiltration.	No mention is made of source pollutant generation by synthetic sport fields. Pollution of storm water is demonstrated by synthetic sport field crumb rubber infill deterioration as documented in research previously provided to King County. (EXAMINATION OF CRUMB RUBBER PRODUCED FROM RECYCLED TIRES ,Department of Analytical Chemistry -The Connecticut Agricultural Experiment Station) This pollutant source contaminates storm water prior to conveyance. No artifacts from phase 1 project demonstrate any analysis of “urban contaminant” removal or qualification of water quality treatment from that source. Phase 2 documents also omit reference or plans to account for and address this source.	<p>The comment asserts a report from Connecticut in the public domain applies to the proposal and further that the SEPA Responsible Official failed to consider rubber infill deterioration for the proposal, and/or that the topic was omitted. (See other responses on same topic below)</p> <p>100% infiltration after cartridge filtration for Phase 2 proposal assumes no particles over a certain size may enter groundwater. This fact is undisputed by the first and second round of public comments on the same subject, regardless of cited report findings in the comment, or prior Phase 1 documentation, or lack thereof on the same subject.</p>
Section B – Environmental Elements, 3 – Water, c. Water runoff (including stormwater) , 2. Could waste materials enter the ground or surface waters?	Answer “yes” with description of parking lot pollutant runoff.	<p>Additional description should be provided to disclose pollutants associated with installation of much more than 1 Million pounds of crumb rubber infill to sports fields. If phase 2 is completed as documented, crumb rubber reclaimed from approx 75000 used tires is to be installed as infill below field turf at Ravensdale Parcel 252206-9012.</p> <p>The urban pollutant generation associated with synthetic turf fields <u>need to be addressed openly with all affected stakeholders including rural community members.</u></p>	<p>The provision of calculations by comment maker as a substitute for Applicant-provided information is a subject to applicable state law regulating the practice of engineering.</p> <p>The calculation in the comment has not been affirmed or disputed, yet it is part of the overall SEPA Review record taken into consideration by SEPA Responsible Official. (See also comment above and below on when storm water on how and when will be reviewed)</p> <p>There is no King County requirement for public agency permit staff to share storm water review duties or results with unnamed affected stakeholders, including rural community members (<u>underlined</u> for referencing part of comment to the response). Storm water permit file access is allowed for public review, but no permit has been filed yet at KC Permitting office. The comment does not change the proposal, the SEPA review, or the conclusion reached by SEPA Responsible Official about the proposal.</p>
Section B – Environmental Elements, 3 – Water, c. Water runoff (including stormwater) , 3. Proposed measures to reduce or control surface, ground and runoff impacts.	Answered: Water quality treatment is proposed and included in the proposal design to meet King County Surface Water Design Manual requirements, NPDES for Construction Activity and WDOE requirements.	This is not accurate and I will attempt to be specific. Water quality for synthetic sports field installation is justified by referencing King County internal memo dated June 8, 2009 (From Curt W. Crawford to Molly Johnson). Relieving KCSWDM requirements with no justification or rationale provided. This memo was the sole reference artifact cited by Ravensdale Phase 1 Professional Engineers (TIR , Herrera Environmental Consultants, 2/11/2011). Enabling scrap rubber deterioration pollution with no analysis “accounting for”, or “mitigation from” requirements.	<p>The comment asserts a disclosed, available 2009 memo in the Phase 1 permit file that is inadequate information for Phase 2 SEPA Review.</p> <p>KC Permitting staff is authorized to decide the 2011 storm water permit for Phase 1. KC Parks has substantial information (CPSC, STC, applicant file, 42 days of public comments, KC file) to conclude rubber deterioration is not measurable, and/or will not occur at subject site. Second, rubber breakdown is not an adverse impact to be mitigated under SEPA for subject proposal. Third, any presence of deteriorated rubber (if it exists, in unmeasurable quantities using available, practical technology) is filtered when attached to larger particles trapped by cartridge filters.</p>

		<p>This project does not strictly comply with Surface Water Design Manual without this memo, and the memo certainly does not provide rational that would support placement on Class 1 Critical Aquifer Recharge Area (CARA1) designation.</p> <p>No artifact has been provided to demonstrate diligence accounting for or mitigating this pollutant source.</p> <p>Other requirements cited support Total Suspended Solid (TSS) removal. DOE filter spec. clearly communicates need for application qualification of pollutants other than TSS.</p>	<p>Phase 2 project is required to be designed to meet KCSWDM, NPDES and WDOE requirements for storm water. The Phase 2 storm water review has not yet been filed, yet the comment also questions if Phase 2 can meet CARA1 requirements. KC Parks presumes if a storm water permit can be issued, it will be issued.</p> <p>All portions of the comment contain unclear citation to “this project” as either Phase 1 or Phase 2, or both.</p> <p>The CARA1 compliance is the proper authority of KC Permitting staff review, not under the jurisdiction of the SEPA Responsible Official.</p> <p>TSS and other elements of storm water permit review will be made by KC Permitting staff.</p>
Section B – Environmental Elements, 4 –Plants, d. – Proposed Landscaping, use of native plans or other measures to preserve or enhance vegetation on the site if any:	Perimeter planting was installed around south, west and north edge of project area during Phase 1, reviewed and permitted in 2011	<p>This is inaccurate sad was not done.</p> <p>Although permitted, and approved as if completed, no plantings were accomplished as part of Phase 1 construction.</p> <p>Neither was invasive species removal nor restoration of construction entrance / damage as specified in Phase 1 Engineering plan.</p>	<p>Noted. Preservation of perimeter plants did occur as outlined in Phase 1 plans. Where applicable, Phase 1 planting that failed and/or not planted can be included in Phase 2. SEPA Responsible official will include this in the SEPA mitigation requirements.</p> <p>KC Permitting staff has the discretion to enable rock pad from Phase 1 to remain and be reused for Phase 2 site construction. Reason: reduces energy consumption, and mitigates site impacts.</p>
Section B – Environmental Elements, 5 - Animals , b. List any threatened or endangered species....	Answered : None.	Ravensdale Park Phase 1 SEPA checklist documented Chinook Salmon in nearby Rock Creek approximately 300 feet south of parcel 252206-9012.	Disagree. Other parts of the SEPA Checklist clearly provide the same information about proximity of the site to Rock Creek. The KC code review limit is 300 feet for CAO jurisdiction. KC Permitting staff determined the Phase 2 proposal does not require CAO review for wetlands, streams or soils, due to distance of the stream from the parcel and distance of proposed site features from the Rock Creek channel. No open channel on the site used by salmonids connects the subject site with Rock Creek.
Section B – Environmental Elements, 5 - Animals , c. Site Part of Migration route	Answered: Elk migrate through and near the site occasionally.	<p>Elk winter range is in and around parcel 252206-9012 which is west construction site.</p> <p>Although occasional year round use might be witnessed, primary Elk use is wintering habitat in which daily (nightly in open areas) occupation observed for 10-16 weeks.</p>	Noted. Anecdotal wildlife observation in the comment adds to other documented WDFW, King County file information already cited in the SEPA Checklist and in attachments. See also responses above and below on same subject.
Section B – Environmental	Answered:	Clarification: Elk Meadow community sponsored feature has	Noted. The reduction of the Elk Meadow feature compared to 3/2008

Elements, 5 - Animals , d. Proposed measures to preserve or enhance wildlife.	An Elk Meadow area is a proposed site feature located in the South west corner of the proposal project area.	disappeared from plans associated with Engineering artifacts. Area (as measured square footage) growth of sports fields and parking facilities has led to decisions reducing original “Community Adopted” Master Plan scale of Elk Meadow from approximately 4 acres to “southwest corner” notation of unknown leftover size. Please be specific!	master plan was graphically inspected on a scaled site plan. However, the Elk meadow size will be larger than 4 acres as a result of the Phase 2 proposal when implemented. The site area for Phase 2 consists of invasive species converted to grasses after grading in Phase 1. It’s unclear if Elk prefer grazing on invasive species, native species grasses or maintained irrigated turf grass. Likely, elk feed on a combination of all 3 types of meadow cover. KC Parks concluded no impact and no associated mitigation results from this comment.
Section B – Environmental Elements, 7- Environmental Health , a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill or hazardous waste that could occur as a result of this proposal?	Checked “No”	Should mention of source pollution of toxic substances be mentioned here? Benzothiazole known to be produced by these sports fields is 20 times more deadly (LD50 – Rats) than automotive antifreeze.	Benzothiazole is asserted to be fatal and part of the proposal without any clear basis that the Applicant’s proposal produces the asserted impact by the element. In the US, there are 4,000+ existing sport fields with similar field surfaces. Subsequent permit review will confirm if the cited material will exist at the site, the quantity, whether the material is mobile as well as whether the material needs to be controlled under the storm water permit.
Section B – Environmental Elements, 8- Land and Shoreline Use, h. Has any part of the site been classified as an "environmentally sensitive" area?	Checked “Yes” Additionally answered: Critical Aquifer Protection Area regulated by state and King County codes encouraging infiltration of stormwater to recharge groundwater.	Additional notation that King County codes pertaining to Critical Aquifer Protection area also places restriction on land use. According to CAO: Except as otherwise provided, the following new development proposals and alterations are not allowed on a site located in a Category I critical aquifer recharge area:..... 11. Wrecking yards; 12. Landfills for hazardous waste, municipal solid waste or special waste;..... Exactly how these directions by King County would be interpreted relative to installation of waste tire byproduct is questioned.	The proposal is not a wrecking yard, also not a landfill, so the 2 footnotes under CARA1 provisions within the zoning classification (Public) do not directly apply from the King County CAO. KC Permitting staff is responsible for oversight of KC CAO day-to-day. KC Parks relies on the conclusion that KC Permitting staff does not regulate synthetic sport fields on public agency owned property as auto wrecking yards or landfills, on the basis of recycled rubber tire material present in components, based directly observed practice by King County on other permit reviews.
Section B – Environmental Elements, 14 - Transportation , f. How many vehicular	Answered: Approximately 400 trips a day when events are scheduled. refer	Check your math! As reported relative to previous SEPA checklist revision, this is significant understatement of study results (likely 33% understatement). Integrating totals of Phase 2 trip generation	The comment questions calculations for the trip counts for average daily and peak hour trips. Trip count calculation is enabled under WA state law by a transportation planner with engineering qualifications. King County Parks and Applicant

trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.	to Traffic impact analysis report prepared by William Popp Associates for daily trips and peak hour volumes.	over 10 minute intervals yields 570 trips /day for weekdays (from table 3 of cited artifact William Popp Associates Traffic Study) and 732 trips /day on Saturdays (from table 4). The daily estimate should be closer to 600 trips /day using weighted average and lower figure for Sunday ((6*570+732)/7)= 593.143. Peak traffic estimates for all days is approximately 200 trips per hour.	may rely on the provided calculations provided as representative and accurate for the proposal. The SEPA Responsible Official, staff of KC Permitting and members of the public can reach the same derivative calculations provided in TIA report and also compare calculations to the number in the SEPA Checklist. When the entire SEPA file is fully considered, the comment did not provide any “new information” since it was possible to derive the comment calculations from provided information in the TIA. The Applicant’s information is considered overall accurate by KC Parks when TIA report detailed information is read together with the SEPA Checklist abbreviated response also considered accurate.
Section B – Environmental Elements, 14 - Transportation .g. Proposed measures to reduce or control transportation impacts, in any:	Answered: Teams participating in sports events will use car pooling, van pools and buses to minimize vehicle trips to and from the site.	This is speculative. If no tangible mitigation measures are proposed, Answer “none”.	The comment states three specific mitigations on the SEPA Checklist for trips are speculative. Single occupancy vehicle trips are the largest share of total trips in King County. Non-commuter discretionary trips including recreation facility sites are the fastest growing share of total Puget Sound regional traffic trips. Total trips can be lowered by carpooling, van pools and bus to Ravensdale Park. Evidence exists in state law and in King County codes (commuter trip reduction program, PSRC reports, etc.) available to Applicant’s traffic consultant and to KC Parks staff supporting the statement that car pools, van pools and bus use can each potentially mitigate (reduce, minimize) total traffic trips and along with trip reduction reduce all associated impacts. The exact percent of reduced trips for Phase 2 proposal was not calculated. Unknown information to Applicant creates no requirement to calculate what is unknown. Mitigation from all 3 methods as stated is potentially measurable.

SEPA Public Comment - Rock Creek Ranch Resident #1 (Part 3)	Community Planning Response	SEPA Responsible Official - Response to Comments
The Ravensdale Park Phase 2 development project proposes features at scale and area density that impacts environment via the following: 1) The materials and designs selected for sports fields implements source pollution without analysis or regard for mitigation, 2) Number and scale of synthetic fields proposed does not respect the “rural character” of Ravensdale Park, 3) The proposed impervious surface installation is far in excess of limits provided in King County Code, 4) the proposed implementation does not adequately provide for wildlife, and 5) Community promoted features to mitigate impacts have	The Ravensdale Master Plan was negotiated, developed, and adopted by a strong majority of stakeholders and the community over an 18 month community planning process. A major topic of the community discussions was the scale of the project and the rural character of the park which is why the original proposal was scaled back and the community meadow, trails, and picnic shelter were added. For more information and a video outlining the process please visit: http://www.greatermaplevalleyareacouncil.org/ravensdale.html	Density relates to residential development, not a recreation site. 1) The materials and designs selected for sports fields provide and include source pollution consideration with analysis and with mitigation, 2) Number and scale of synthetic fields proposed are consistent with the “rural character” of Ravensdale Park. Photos provided during comment period document visual fit of the existing site with rural context (for example, homes and yards with gravel strips and irrigated and fertilized lawns).

<p>been marginalized. . Each of these will be elaborated upon in detail.</p>		<p>3) The proposed impervious surface installation is within the limits provided in King County Code. If determined by KC Permitting staff upon review of the permit application (not yet filed by Applicant) the amount of proposed impervious area needs to be reduced to comply with the 35% limit, the Applicant's response will be to implement a proposal consistent with the anticipated DNS for Phase 2 with less impacts than SEPA review has considered.</p> <p>4) The proposed implementation of Phase 2 adequately provides for wildlife, including seasonal elk migration, in the form of an Elk Meadow area plus the same or larger open areas of the site that can be traversed, used for resting, sleeping or standing herds, compared to the site master plan.</p> <p>5) Community promoted features to mitigate impacts has been included in the proposal, including plantings.</p>
<p>1) The materials and designs selected for sports fields implements source pollution without analysis or regard for mitigation. The current (Phase 1) sports field designs are assumed representative of technologies expected in detailed Phase 2 engineering yet to be released for review. The current design relies upon a crumb rubber infill material known to be urban pollution source as it deteriorates (Reports substantiating this have been provided to King County Parks) . Estimates of amount of crumb rubber installed at phase 2 completion are estimated with 2 inch infill to be (2.5 +6.428 acre)(43,560 sq. ft. / acre)(1/6 Ft deep) (28Lb / cubic foot) = 1.814 Million Pounds. At 20 Lbs per passenger car tire, this would equate to 90,744 equivalent tires buried as infill in the west parcel of Ravensdale Park. The very lowest estimates of density for Crumb Rubber infill would still have well in excess of 75,000 equivalent tires buried in the park after phase 2. I deem that this scale of toxic urban pollutant generating material proposed for installation in "wellhead protection" area without proper engineering analysis is negligent. King County's own Phase 1 technical report on soil conditions communicates, "According to the geotechnical report prepared for this project (Johnson personal</p>		<p>Disagree. Matrix material will lie above an impermeable liner, not buried in soil.</p> <p>The matrix material may be crumbled rubber, and/or other material.</p> <p>The matrix material will be replaced every 10 years, on average, as part of routine maintenance. This fact prevents the ability for the matrix material to degrade substantially, or enter water table in a degraded condition as asserted in the comment.</p> <p>The comment writer is not enabled under the state law or code to substitute his calculations for Applicant's information or replace his judgment instead of KC Permitting staff charged with the duty to review and approve water quality permits. Authorized agency staff can rely on Applicant's professionals' consultant's calculations. The Applicant's professionals are enabled by state law to calculate, and public agency staff can rely upon Applicant's calculations to reach permit conclusions about the proposal.</p>

communication 2007), soil layers below fill sand underlying the existing playfields have been stripped of most of their topsoil and organic matter, so it is unlikely that underlying soils would have properties that reduce the risk of groundwater contamination “(Phase 1 TIR). The 2012 comprehensive plan informs that placement of sources of “urban” pollutants in rural park are not supported.		
I want to repeat for clarity - Over 1.5 Million Pounds or 75,000 passenger tires buried in Ravensdale Park and sourcing toxic pollution without analysis or mitigation is what is currently proposed as Phase 2.		KC Parks as SEPA Responsible Official considered Applicant’s materials and all information on file. Substantial file information refutes all four aspects of the comment (provided calculations, consideration of toxic pollution, existence of analysis, inclusion of mitigation provisions). The conclusion by KC Parks is that considerable SEPA information has been provided, analysis was considered for impacts that do not clearly result (due to temperature and soils that exist, due to lack of likelihood of transfer of materials into groundwater) yet reasonable mitigation is provided never the less (cartridge filtration) part of the Applicant proposal as a reasonable response to all stated concerns in the comment.
2) Number and scale of synthetic fields proposed does not respect the “rural character” of Ravensdale Park. As cited in corrections to SEPA checklist above , King County code by way of Comprehensive plan (R-201, R-324) would indicate limiting installation of facilities only to support rural residents. The 2010 Census has the entire 98051 zip code at 3270 with demographic breakdown by age. Generous assumptions applied to population distribution yield 400 +/- sports enthusiasts for league play. The proposed capacity of 3 synthetic turf play fields for each, baseball and soccer (in addition to natural turf fields already provided) is not supported by rural population analysis. King County (Comprehensive Plan R-326, R-336,) would indicate that capacity in excess of current rural need, or needs of urban residents should NOT be placed in rural area and “shall be located in neighboring cities and rural towns”.	The Ravensdale Master Plan was negotiated, developed, and adopted by a strong majority of stakeholders and the community over an 18 month community planning process. A major topic of the community discussions was the scale of the project and the rural character of the park which is why the original proposal was scaled back and the community meadow, trails, and picnic shelter were added. For more information and a video outlining the process please visit: http://www.greatermaplevalleyareacouncil.org/ravensdale.html	Population by zip code 98501 approximately aligns with Ravensdale rural community limits. The rural character of the proposal the proposal is challenged in the comment. KC Parks determined synthetic sport surface conforms at the subject site, for the subject proposal. See also other responses on similar comments. The Seattle Times April, 2007 article about Ravensdale Park master plan reports 1,600 players would likely use the site annually (accessed on NW Source.com website May 17-20, 2013) compared to the 400 sports enthusiasts for league play. KC Parks believes the rural area population needs are matched to the Phase 1 & 2 number of total sport fields, taking into account the number of existing leagues, participation rates and sport enthusiast population counts. The comment asserts that Ravensdale Park conflicts with 4 policies (R-201, R-324, R-326 & R-336) based on population served by the park site yet this is not a matter for SEPA Responsible Official to address or resolve. The King County Council established Ravensdale Park and also established the 4 policy provisions. The conclusion reach by KC Parks is that no conflict exists among the 4 policy statements, the population or the master plan. If a conflict exists (none is known), conflict resolution of 4 policies, the master plan and population served is not within the SEPA review scope of Phase 2 proposal.
3) The proposed impervious surface installation is far in excess of limits provided in King County Code. The Critical Area Ordinance would apply as removal of all vegetative cover in favor of impervious surfaces would		“Clearing limits” constrained to 35% of parcel area may be reviewed parcel by parcel and in aggregate for entire park the proposal for impervious including walks or restrooms. Whether 35% applies separately or in aggregate, or can be addressed under a lot line adjustment (if required) the matter will be reviewed by KC Permitting staff for proper interpretation of all

<p>fall under guidance of “clearing limits” constrained to 35% of parcel area. This would imply that for 20 acre parcel 252206-9012 , 7 acres would be supportable impervious surface installation. Current proposal has 10.429 Acres of impervious not including walks or restrooms. This should be indicative for level of development that is too aggressive for rural setting. I understand that clearing limits are not now being enforced due to tax law implications. This should not apply and King County should support its own standards of development OR have open conversation justifying rational for exception.</p>		<p>applicable provisions, including the CAO limit of 35%. However, KC Permitting staff will decide whether synthetic surface is impervious (within the range of 0% to 100% impervious), or fully eligible to be considered (under a variance, a waiver, an exception or an administrative determination) as partially, or fully permeable for infiltration. The proposal describes storm water will be collected, treated and then 100% infiltrated, as proposed and as disclosed in the SEPA Checklist with attachments.</p>
<p>4) The proposed implementation does not adequately provide for wildlife. The proposed Phase 2 project only supports the park wildlife as “leftover priority” supporting community interests. This is clearly communicated by lack of “fair process” in unilateral modification of “Community Adopted” Master plan expanding sports field and parking land allocations while reducing size of Elk Meadow. Modification of southwest field to include lighted soccer play in Winter after dark seriously compromises “Elk Meadow” intended purpose as Winter activity will deter Elk from meadow use.</p>	<p>Wildlife habitat preservation is addressed by King County-adopted Rock Creek Vision. Ravensdale Park is identified in that vision as the most appropriate location for community recreation.</p> <p>Many organizations participated in the development and implementation of the Rock Creek Valley Conservation Plan. The Rock Creek Valley, whose footprint closely matches the 98051 zip code area for Ravensdale, Washington, is approximately 32 square miles in size.</p> <p>In 2003 when the Friends of Rock Creek Valley (FRCV) completed a parcel-by-parcel analysis of the Rock Creek Valley 72% of the Valley was forested (just a bit more than 15,300 acres). The goal of the Conservation Plan was to retain around 65% forest cover long term (just a little bit more than 13,300 acres).</p> <p>As of 2013 over 8,000 acres in the Rock Creek Valley have been protected through fee simple ownership and conservation easement. There are current efforts and negotiations for a conservation easement on an approximately ~900 acres of forest land. The parcels selected for fee simple ownership and conservation easements were selected based on environmental rankings. These rankings included points for quality wildlife habitat, wildlife corridor connectivity, and parcels that helped make up larger blocks of forest (1,000+ acres).</p> <p>When parcel-by-parcel analysis of the Rock Creek Valley was completed the Ravensdale Park site and the parcel acquired near the post office (the Community Meadow) failed to rank even as a</p>	<p>The Elk Meadow in Phase 2 is larger in size of total area compared to the master plan.</p> <p>Perceptions of unfair process are not supported by the SEPA review file. Fully meeting the comment maker’s expectations of fairness is not the applicable standard for SEPA public comments and SEPA review for King County. The applicable public comment opportunity for Type 1 Administrative Permit is a 21-day SEPA review. Also, a second 21-day review provided a total of 42 days. In addition, during the first comment period 11 calendar days of additional time was afforded to 2 comment makers following the end of the first comment period. During February to mid-May, 2013 the two advertised comment period provided ample opportunity for public comment. No comment submitted was ignored whether timely or late. Every comment was fully considered whether timely filed, late, granted more time, or part of a first or second public review period. Only two comment makers fully participated during the first and second comment period. In fact, a fair process was provided in addition to a compliant process. There were no comments from any federal state agencies. Only 1 comment from 1 local agency, but none from any tribes. In conclusion, KC Parks finds based on considerable information that there is no basis for the comment maker to assert a lack of fair process for the second time following the second 21 day comment period.</p> <p>The speculative range of impacts to Elk for the Elk meadow area (meadow will be larger in size than master plan shows) could be variable. Positive impacts requiring no action under SEPA include the potential for a greater use of site by the same number of elk. Or, the impacts requiring no mitigation could be no use by any elk (due to a wide variety of other factors unrelated to the proposal - rural traffic accidents with large animals, predators, hunting regulations or herd health). Most likely, Phase 2 creates no probable significant adverse impact to any existing elk based on meadow size. The 5 types of impacts considered include: 1) fully disclosed impacts that were known and studied (meadow size & shape), 2) unknown impacts managed and tracked by WDFW staff, the state’s designated wildlife expert of the elk herd in SE King County, 4) unstudied impacts for which no clear mitigation exists (none known) and 5) disclosed unavoidable impacts (more intense site use by humans along with continued Elk site</p>

	moderately important parcel to protect for habitat. It failed to gain points as a urban/rural buffer, as an aquatic/riparian area, as part of a wildlife habitat block or corridor, or as part of a primary forest block. It was ranked high as an opportunity to provide an area for active recreation and ranked high for development risk (homes) such as Rock Creek Ranch.	use).
5) Community promoted features to mitigate impacts have been marginalized. Facts related to plan changes have already documented concerns about Elk Meadow size being reduced. In addition, mitigations to park noise, light and traffic by way of buffer plantings have been eliminated from execution plans although they remain in design documents. Phase 1 buffer plantings were NOT accomplished although the Phase 2 artifacts represent that they were. Landscaping elements such as perimeter berms originally included in “Master Plan” planning activities to gain support of community appear to have been abandoned.		<p>The comment asserts marginalized mitigation but the comment statement is not supported by the SEPA review record and files by Applicant, including comments and responses summarized as follows:</p> <ul style="list-style-type: none">• Mitigations to park noise are included in perimeter buffers widths including native plants to remain.• Mitigation to light in the form of light fixture selection was fully disclosed along with photometrics• Mitigation to traffic in the form of buffer plantings is part of Phase 2 drawings.• Phase 1 buffer plantings can be accomplished in Phase 2. The number of plants are limited in-fill quantity shown along west property line.• Landscaping elements such as perimeter berms originally included in “Master Plan” would require removal of existing trees in the provided perimeter buffer with retained mature trees and understory native species shrubs. Since berms create vegetation and earthwork impacts that are avoidable, berms are not proposed by Applicant and are not required by KC Parks.• All provided mitigations are considered adequate – not marginalized.
In closing I would like to provide some balance to this set of comments. I am not implicitly against development at Ravensdale Park. I am not even against more sports fields. I am completely against sports field development to the exclusion of all other design considerations such as community features, and legal or environmental concerns. King County needs to support balance in brokering interests in public park projects that has not been obvious to me as a rural community member and park neighbor. I believe that the current Phase 2 proposal seriously impacts rural environment and should not be accepted “as-is”. I therefore favor additional process steps to address environmental impacts expected by pursuit of Ravensdale Phase 2 proposal.		<p>Statements by the comment maker were given due consideration and review by the SEPA Responsible Official, in reaching the conclusion to issue a Mitigated DNS for Phase 2 proposal.</p> <p>Comments with responses were also shared with King County Council, as follow-up to the comment writer’s outreach to County elected officials and their respective staff.</p>

SEPA Public Comment - Covington area resident		Response by SEPA Responsible Official
Three email messages sent to the King County Parks		The comment is a May, 2013 email that includes his questions and assertions

Department Director regarding toxicity of artificial turf type fields, and plans by King County to install such fields. Messages were sent by the comment maker to KC Parks on 7/16/12, 8/8/12, and 9/14/12, and then included as 1 timely SEPA comment on the subject proposal.		about 2 press releases from 2 non-profit organizations. Neither document was verified (unknown if it is an excerpt, full document, a partial or edited) yet both were accepted as part of the comment maker's overall email dated May, 2013. Both press releases are public domain documents (not "new information" under SEPA) seeking to change local public opinion and/or change federal regulatory agency action by CPSC agency. As such, the entirety of the comments can be described as public regulatory advocacy messaging yet the email was reviewed as a SEPA comment at comment maker's request, and fully considered by KC Parks on the merits and applicability to the proposal.
Concern of whether King County was considering this information when processing SEPA matters related to installation of artificial turf fields in King County, including of course, at the Ravensdale site.		Noted. The file includes SEPA Checklist plus attachments describing the proposal plus public comments that provided additional information to the total body of information all taken into consideration during SEPA – regardless of origination of the (agencies, applicant, professionals, citizens) of information.
<p>How does King County evaluate concerns about toxicity related to the installation, and use of artificial turf fields?</p> <p>In carrying out SEPA evaluations, how are considerations relative to the toxicity of artificial turf fields considered, and what sources of information does King County consider in carrying out such considerations?</p> <p>How were these matters considered/addressed during the SEPA evaluation and determination(s), made relative to the Ravensdale site's proposed installation, and use of artificial turf?</p>		<p>For the subject proposal, the Applicant provides technical information to KC Parks functioning as SEPA Responsible Official. This is typical for most King County SEPA reviews (whether SEPA is performed by KC Parks or KC Permitting staff or other) for Applicant to bear the primary burden of responding to incoming SEPA comments about Applicant's proposal. For clarification, KC Parks is not the Applicant.</p> <p>Sources of Information considered include:</p> <ul style="list-style-type: none"> • Prior similar projects permitted in King County and Washington state, including SEPA reviews; • Manufacturer information including MSDS forms for products; • Professional associations and societies with relevant public domain information including ASLA, STC, ASTM; and, • Agency information, including WDOH, WDOE and King County agencies. <p>The above listed information was fully considered by Applicant's technical reviewers and KC Parks staff making the SEPA determination of a DNS.</p>
King County has been provided ample notice of concerns related to the potential toxicity of artificial turf fields, and ask that if this issue was not considered during the SEPA process for Ravensdale, that the SEPA process be reopened for		Noted yet respectfully disagree - "New Information" does not exist merely because comment maker adds 2 press releases dated 2012 to the SEPA file, then asserts the information is new and the proper cause for reconsideration, and/or additional SEPA review. The Applicant's proposal

<p>consideration of this matter. If this matter was not specifically considered in the Ravensdale SEPA process, my position is that the process is defective requiring reconsideration, and/or that this email constitutes "new information", also requiring that the SEPA process be reopened for consideration of this matter.</p>		<p>was not revised as a result of the provided information during 60 days of public comment (2 advertised periods of 21 days, plus additional time in between for 2 comment makers).</p> <p>Existing information includes public domain existing information including the 2 press releases dated 2012. Submitted as a SEPA comment, the 2012 press releases was formally considered by applicant’s representative and by KC Parks. The two topics of the two press releases (heat effects on crumbled rubber tire and lead levels at 2 sport fields in New Jersey) were both topics well known to Applicant’s consultant, to KC Parks considered prior to making a SEPA determination. The 2 documents are mostly not directly relevant to the proposal, except for 2 points of information supportive of issuing a DNS to the proposal.</p> <p>See responses below about the two press release documents below.</p>
<p>This comment was prompted by a combination of a recent email from DNRP on the intent to put in new artificial turf playing fields in SE King County, and the article (below), about dangers of potential lead exposure to kids in use of such fields, and other playing surfaces where artificial "rubber" surfaces are used.</p> <p>The article is from the Public Employee's for Environmental Responsibility.</p> <p>Immediate Release: July 12, 2012 Contact: Kirsten Stade (202) 265-7337</p> <p>LEAD LIMITS NEEDED ON TIRE CRUMB PLAYGROUNDS — CPSC Ruling on Artificial Play-Areas as Children’s Products Sought</p> <p>Washington, DC — The Consumer Product Safety Commission (CPSC) should prevent children from being exposed to lead and other harmful heavy metals in playgrounds and school sports fields made from shredded tires, according to a formal request for an advisory opinion filed by Public Employees for Environmental Responsibility (PEER). Strict lead limits would follow automatically from CPSC classifying tire crumb playgrounds, play mats and plastic turf school sports fields as</p>		<p>The press release calls for action by CPSC, but the described action was not issued by CPSC. The term ‘DRNP’ was not confirmed and is unknown.</p> <p>The article is public domain information as a press release, not “new information” for SEPA. The press release is about lead levels and federal regulations applicable to product manufacturers.</p> <p>The provision of the press release article does not assert any specific impact, specific harm suffered about the subject proposal.</p> <p>The New Jersey DEPA report relies on a small sample of 5 schools. One or more New Jersey sport field site installations with high lead levels have been widely reported over past several years. The New Jersey findings have been peer reviewed by installation, design and manufacturing firms within Synthetic Turf Council (STC) technical committees, as well as during a panel discussion in 2010 at ASLA Annual conference held in WA, DC. In short, KC Parks concluded the New Jersey sport fields reports about lead presence is specific and contextually specific to the New Jersey and generally not applicable to conditions typical of 4,000 installations throughout the US, and also not applicable to the Ravensdale Park site. Opponents of synthetic surfaces frequently cite the findings of the New Jersey sport field installation while manufacturer and industry responses show the New Jersey report findings are site specific, and not universal to most of the US.</p>

<p>children’s products.</p> <p>In 2008, Congress passed a law tightening safeguards for children’s products by imposing a lead content limit and third-party testing to ensure compliance. That same year, lobbyists for the synthetic turf industry met with CPSC representatives and came away with an ambiguous outcome which the industry touted as a recommendation not to classify their products as children’s products. PEER is formally asking the Commission to issue an opinion affirmatively classifying school sports fields and playgrounds as children’s products, as CPSC already so classifies playground equipment such as swings and slides.</p> <p>“The Consumer Product Safety Commission needs to clear up the confusion its actions have caused and its continued inaction has perpetuated,” stated PEER Executive Director Jeff Ruch, noting that a CPSC advisory opinion would settle the issue without need for extensive rule-making. “If a slide is a children’s product so is the synthetic material the child lands in at the bottom of the slide.”</p> <p>The concerns about lead exposure have taken on a new urgency following the release in June of 2012 of a study done for the New Jersey Department of Environmental Protection which found artificial fields made of tire crumb can contain highly elevated levels of lead much greater than the allowed levels for children:</p> <ul style="list-style-type: none">• It reports “concerns with regard to potential hazards that may exist for individuals and in particular children who engage in sports activities on artificial fields”; and• Inhalable lead “present in artificial turf fields can be resuspended by even minimal activity on the playing surface.” <p>The study was hampered by the unwillingness of schools with artificial turf field to have them tested. A total of 50 schools were approached by researchers and ultimately only 5 schools consented to testing their fields. The study concludes with this observation:</p>		<p>Washington state (as of mid-May, 2013) has several hundred existing synthetic surface fields successfully installed and safely maintained in compliance with water quality and public health standards. Synthetic fields installed recently in SE King County include use of federal, state and local funding nearby, including Enumclaw Stadium at KC Fairground, now owned by City of Enumclaw, and a facility site in nearby Preston. Other examples of public agency funded and public agency owned and managed fields that were subject to SEPA and/or NEPA review include sport fields at Bear Creek, Petrovisky Road, US Navy Whidbey Island, WWU, Federal Way School District, City of Bellevue Parks sites plus many other examples. Despite urging in the press release, the New Jersey study was considered inconclusive. CPSC has not reclassified lead exposure from tire crumb for sport fields.</p>
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<p>“For the present time, how widespread the presence of these high lead level fields is, is an unknown. At present the economic disincentive for schools or communities to measure the presence or absence of lead contamination appears to exceed any public concern for children’s safety.”</p> <p>“This study shows that children running, jumping and playing as expected actually increases the risks of lead contamination,” Ruch added, pointing out that inhalation, ingestion and dermal absorption are all pathways for lead exposure from tire crumb. “For the sake of children’s health and safety, the Consumer Product Safety Commission should revisit this question as soon as possible. These products should not be able to evade lead standards and testing simply because the Commission has not taken the time to classify them.”</p>		
<p>There are three basic questions in this regard (sports surface toxicity):</p> <p>1) Has King County considered children's exposure to lead when considering installation of artificial surfaces in King County Parks?</p> <p>2) Is this issue considered and addressed when SEPA consideration of such park alterations, or installations are done?</p> <p>3) What steps does King County take to assure that artificial turf/surfaces installed in King County Parks are free of toxics, which could be detrimental to the health of those, especially young children, who uses such parks, and surfaces?</p>		<p>Yes. Responding to Comment #1, lead levels was considered for sport fields from CPSC, WDOH, STC in the public domain plus 1 prior similar project SEPA file for a permitted facility in King County as the information considered by KC Parks for the subject proposal.</p> <p>(unclear reference to “this issue” in Comment #2) Yes. Based on Comment #1 in paragraph above, the SEPA Checklist including attachments discloses lead levels considered by KC Parks.</p> <p>Comment #3 is referred to King County generally for a separate response, as a general inquiry about all of King County’s review that would include the subject proposal. The SEPA review enabled by state law and King County code does not require a customized “ask & answer” about review procedure. Comment #3 seeks a very broad scope response covering a wide variety of programmatic topics widely available in public domain information, some of which is not directly relevant to the proposal under review. The standard “free of toxics” is not the applicable threshold required for SEPA determination for the subject proposal. The term “detrimental to health” is an unsupported very broad assertion, not a specific impact requiring a SEPA response for the proposal. Disclosure of environmental impacts of synthetic surfaces, including unavoidable impacts and trace levels of material components that are below currently issued guidance from CPSC plus other sources of public information. In addition to the Applicant’s</p>

		proposal materials, widely available public domain information has been applied by KC Parks as SEPA Responsible Official for concluding a DNS is well supported for the subject proposal.
<p>Comment maker submitted a recent press release from Public Employees for Environmental Justice (sic).</p> <p>For Immediate Release: September 6, 2012 Contact: Kirsten Stade (202) 265-7337</p> <p>ARTIFICIAL TURF FIELD HEAT DANGERS REQUIRE SAFEGUARDS — Synthetic Turf Temps as High as 200 Degrees Pose Particular Peril to Children</p> <p>Washington, DC — The Consumer Product Safety Commission needs to issue heat guidelines to protect children and athletes from extreme temperatures on artificial fields, according to a formal rule-making petition filed today by Public Employees for Environmental Responsibility (PEER). Composed of shredded tires, plastic and other synthetic materials, these artificial playgrounds and sports fields act as heat traps, recording surface temperatures of 168 degrees in air temperatures as low as 73 degrees.</p> <p>Neither frequent watering or new infill techniques significantly reduces heat levels on these syn-fields. Exercise on these over-heated surfaces is associated with health effects ranging from –</p> <ul style="list-style-type: none">• Heat exhaustion, heat stroke and extreme dehydration;• Burns and heat blisters, even blistering through shoes; and• Off-gassing of dangerous vapors from carbon black, lead, mercury and an array of other toxins. As fields heat, noxious materials can be absorbed in gases that can become 10 to 20 times more toxic than the materials themselves. <p>There are now an estimated 4,000 artificial turf fields in the U.S., with the number growing each year. The fields are subject</p>		<p>The public domain article appears to be from PEER (not PEEJ, a non-existent organization). The press release article is not “new information” for SEPA review.</p> <p>The provision of the article does not assert any specific impact, specific harm suffered about the subject proposal, yet 2 facts are supportive of issuing a DNS, based on the high number of other public agencies allowing similar field proposals, based on the associated positive impacts.</p> <p>Most of the press release article is not applicable to the proposal. Site surface temperatures would not reach 168 degrees, or the 200 degrees mentioned in the headline, due to site context and range of site temperatures at subject site. Air temperatures of 73 degrees exist on a very limited number of days seasonally at the subject site, typically reaching or exceeding air temperature of 73 degrees or higher only few hours within a typical day. The number of total days when site temperature is above 73 degrees is approximately 2 to 3 weeks a year total spread between May and September (Source: Natural History of Puget Sound)</p> <p>Health impacts in the press release article applies primarily to desert south west fields in sun states, locations with more sun, sites with higher average air and surface temperatures as well as sites with fewer tall trees at the perimeter compared with the subject site and subject proposal.</p> <p>In support of issuing a DNS for the proposal based on positive impacts, most of the 4,000 existing synthetic surface fields in the US are public agency funded proposals on public land with permits issued by public agencies. Also, most of the 4,000 fields are public agency owned, operated, scheduled, maintained and/or managed facilities that have not been determined to pose health risks asserted, implied or suggested by the comment.</p> <p>In support of issuing a DNS for the proposal based on positive impacts, sport fields with synthetic surfaces are growing in popularity in the US and in King County because the synthetic field surface is a practical method to control sprawl (fewer active recreation sites enable more intense use), to meet environmental goals for ground water quality and water conservation, to meet goals for reduction of GHG (associated with the impacts producing and</p>

<p>to no health or safety standards. This April, the Consumer Product Safety Commission (CPSC) issued a factsheet warning parents to be careful about surface heat on playgrounds, especially those composed of “dark plastics and rubbers” but the agency has yet to take regulatory action.</p> <p>PEER is urging CPSC to adopt regulations governing heat restrictions on artificial fields, coupled with heat monitoring and posting to alert parents, coaches and players about hazardous conditions. The regulations would be similar to those CPSC has adopted for the surfaces of electronically operated toys.</p> <p>“These artificial fields can heat up like frying pans. On some days, your shoes get so hot that it hurts just to walk out onto the field,” stated PEER Executive Director Jeff Ruch. “These very real heat dangers are not widely understood and people wrongly presume that a publicly-maintained field must be safe. That is precisely why we need enforceable limits and postings to prevent needless pain and potential tragedies.”</p> <p>The artificial turf industry itself is aware of the dangers of heat on these fields. In a recent interview with NPR, Rick Doyle, president of the Synthetic Turf Council stated “I don't think anyone in our industry would suggest it's a good idea to play on a surface that's that hot.”</p> <p>“If the industry itself acknowledges the high heat dangers, the Consumer Product Safety Commission should not hesitate in promulgating regulations,” Ruch added. PEER is also pressing CPSC to treat playgrounds and school sports fields as “children’s products,” a classification triggering strict lead limits. Shredded tires, the main components of these fields, contain tire ingredients, such as lead, arsenic, cadmium, chromium, mercury and a number of dangerous hydrocarbons with potential toxicity especially in direct contact with children.</p>		<p>applying fertilization for natural turf) as well as many public health benefits associated with active living (reduced national & local health care costs, fewer diabetic treatments, etc.)</p> <p>Coaches and parents of kids typically verify safe play conditions (including times of high temperature levels) at fields prior to facility use, by applying common sense and good parental judgment.</p> <p>CPSC issued advisory information about surface heat for parents. However, CPSC has not yet taken regulatory action on heat caused crumbled tire ingredient breakdown, despite the press release urging such action.</p>
SEPA Public Comment – Rock Creek Ranch Resident #2		SEPA Responsible Official Response to Comment
Note: The comment maker is a resident of Rock Creek Ranch residential area providing 8 numbered comments in 4 pages that are substantially similar to 8 topics reported in his prior		No “new information” was provided to SEPA Responsible Official or Applicant as result of any information in the 4 page comment letter. However, all of the submitted information provided pre-project site

comments (as well as similar comments made by others) during the first and second public comment periods, with additional detailed information, site photos of site parking and temporary erosion control measures that remain onsite from Phase 1 proposal.		condition documentation that is directly observable by any member of the public visiting the site. The comments were duly noted and fully taken into consideration during the SEPA Review.
1) LLC Interests are not consistent with Ravensdale residents (See comment letter for full text)	Ravensdale residents represent a broad variety citizens with varying interests including residents who enjoy youth sports, playgrounds, trails, passive recreation, open space, and many other features provided by Ravensdale Park and surrounding King County parks land. The Ravensdale Park Foundation is charged with being the steward of and fundraising for the Ravensdale Master Plan. The Master Plan was negotiated, developed, and adopted by a strong majority of stakeholders and the community at large over an 18 month community planning process. For more information and a video outlining the process please visit: http://www.greatermaplevalleyareacouncil.org/ravensdale.html	Noted but the comment is not directly relevant to SEPA review. However, the standard for SEPA determination is not the degree of alignment with neighborhood residents for the Applicant's form of business as a Limited Liability Corporation.
2) Phase 2 Development goes against Zoning Designations (See comment letter for full text)		Phase 1 is an active recreation proposal substantially similar to Phase 2 with a different number of fields. The site is zoned for public park recreation and Phase 2 proposal is active recreation enabled by and consistent with the site zoning.
3) Pollution concerns, asserting crumb rubber tire will achieve 165 degrees then emit substances not filtered before entering groundwater. (See Comment letter for full comment)		No scientific process basis was provided for the existence of 165 degree surface temperatures asserted to exist at subject site, or how emissions would be made at that temperature and simultaneously or subsequently be transmitted into groundwater. At least 3 physical processes are required to align yet these do not align in nature at the site. Rain fall is substantially colder than 165 degrees so the material would not emit at the colder temperatures during rainfall. Infiltration is a substantially long process through 50 degree glacial till soils. Rainfall is not typically present in the warmest temperature days. Ground temperatures exist in the range of 50 degrees year round a few inches below the site surface. If surface temperatures briefly hit 165 degrees (unlikely and infrequent), it's unknown if emitted substance will reattach to tire crumb (or attach other sand particles filtered out before entering groundwater) within the subsurface zone that remains at cooler temperature year round. In short, the findings from other regions of the US have not been proven by the information in the comment to exist at the subject site. Nothing asserted is caused by the proposal based on air temperature and soil basic information.

4) Insufficient Parking will Spill over to Residential Streets, asserting that current use of Phase 1 site already impacts residential streets, providing 42 cars parallel parked along drives within site compared to 25 spaces near Phase 1. (See Comment letter for full text of comment)	Sufficient parking is provided in the plan per the TIA and King County regulations, as well as, in response to neighborhood concerns about parking adequacy. If public parking on 268 th becomes a concern during operations of Phase 2 facilities then the community will work with King County Parks and King County Roads to implement enforceable “No Parking” signs on both sides of 268 th .	The comment speculates on exactly how the site hours of operation and number of games will relate to parking adequacy, a topic well vetted during the first open comment period on the subject proposal, and analyzed in applicant’s materials and TIA report.
5) Insufficient Restroom Capacity, citing only 1 existing restroom serving Phase 1 and none proposed for Phase 2. (See comment letter for full text of comment)		The restroom serving Phase 2 is clearly mentioned in several responses in the SEPA Checklist information as a future phase improvement, to be sized to meet applicable permit requirements.
6) Light Pollution, citing 70 foot poles and questioning 80 foot tree availability to block light. (see comment letter for full text of comment)		Lighting at a sport field park is not pollution yet has been considered an objectionable impact according to the comment. However, the spill and glare control of the sport lighting system was disclosed in SEPA Checklist and attachments, describing a lighting system that minimizes offsite impact while also providing safe light levels to protect players from injuries. The same topic was well vetted during the first public notice review period. To clarify, Applicant did not propose installing 80 feet tall trees to directly mitigate 70 feet light poles. An inference was made by the comment writer and then the result of the conclusion was asserted in the comment as inadequate mitigation. Due to sight angles, typical eye level within 4 to 6 feet above ground levels combined with the varied distance from light source, vegetation at lower heights (branches and foliage combined) effectively screens light viewed from offsite locations. Vegetation combined with lighting system are two forms of light mitigation working in tandem.
7) Elk Habitat, posing questions about whether the proposal will drive elk into residential neighborhoods. (See comment letter for full text of comment)	<p>Wildlife habitat preservation is addressed by King County-adopted Rock Creek Vision. Ravensdale Park is identified in that vision as the most appropriate location for community recreation.</p> <p>Many organizations participated in the development and implementation of the Rock Creek Valley Conservation Plan. The Rock Creek Valley, whose footprint closely matches the 98051 zip code area for Ravensdale, Washington, is approximately 32 square miles in size.</p> <p>In 2003 when the Friends of Rock Creek Valley (FRCV) completed a parcel-by-parcel analysis of the Rock Creek Valley 72% of the Valley was forested (just a bit more than 15,300 acres). The goal</p>	The comment asserts a concern that elk would be driven into adjacent neighborhoods as a direct result of the proposal. Responses to other elk meadow related comments establish that the proposed meadow area will be larger than shown in the master plan, not smaller. Regardless of elk meadow size, the assertion of elk driven into residential neighborhoods is an unknown impact of unknown probability. Wildlife are not entirely predictable. Also, Comments #1, #2 & #7 when read together clearly support the conclusion that the comment writer enjoys rural residential area atmosphere yet does not welcome active sports facility at the park site or the presence of elk (coyotes, deer are noted as existing in the rural area) on his property as direct consequence of the proposal. It is unknown exactly what existing elk might do with or without the proposal. Elk migration and elk meadow site feature has been analyzed by several comments during first and second

	<p>of the Conservation Plan was to retain around 65% forest cover long term (just a little bit more than 13,300 acres).</p> <p>As of 2013 over 8,000 acres in the Rock Creek Valley have been protected through fee simple ownership and conservation easement. There are current efforts and negotiations for a conservation easement on an approximately ~900 acres of forest land. The parcels selected for fee simple ownership and conservation easements were selected based on environmental rankings. These rankings included points for quality wildlife habitat, wildlife corridor connectivity, and parcels that helped make up larger blocks of forest (1,000+ acres).</p> <p>When parcel-by-parcel analysis of the Rock Creek Valley was completed the Ravensdale Park site and the parcel acquired near the post office (the Community Meadow) failed to rank even as a moderately important parcel to protect for habitat. It failed to gain points as a urban/rural buffer, as an aquatic/riparian area, as part of a wildlife habitat block or corridor, or as part of a primary forest block. It was ranked high as an opportunity to provide an area for active recreation and ranked high for development risk (homes) such as Rock Creek Ranch</p>	<p>public notice periods. A predatory relationship exists between coyote and deer, and between coyote and young elk. Attracting elk to Ravensdale Park elk meadow mitigates the impact to elk migration. KC Parks will not require any mitigation for the asserted impact (comment asserts elk will be driven into residential areas directly as a result of Phase 2 proposal, KC Parks disagrees). In making a finding and conclusion, KC Parks considered the asserted impact is unlikely, unpredictable and unknown if it would actually occur. KC Parks fully considered the comment, then concluded the asserted impact is not a probable significant adverse impact so it is not in need of any mitigation.</p>
8) Accountability, regarding site photos of Phase 1 temporary erosions control measures and ecology blocks to control site access. (See comment letter for full comment text)		<p>Disagree. The reuse of Phase 1 temporary sediment and erosion control measures (rock access pad, etc.) was reported in the SEPA Checklist and during first and second public notice periods. The code does not prevent reuse of the temporary measure for a phased project.</p>

City of Kent Comment letter		SEPA Responsible Official Response
City of Kent issued a 3 page letter with 8 substantive comments plus 1 general comment. All comments are related directly or indirectly to groundwater protection of municipal drinking water supply wells located near and nearby subject site, as follows:		All 9 comments in City of Kent's letter resulted in 8 proposed SEPA mitigation conditions for KC Parks to require Applicant to include in the implementation of the proposal, as a Mitigated Determination of Non-Significance (MDNS). The 8 mitigation conditions have strong basis in public law, the agency has a presumption of validity, and comments are concise requirements related directly to applicable requirements (NPDES Construction Activity permit implementing Clean Water Act provisions plus state law protecting public drinking water supply).
1) Zone 1 & Zone 2 applicable to 3 existing wellheads identified in proximity to site and subject proposal, with 1 year or 5 year travel time for groundwater.		Noted. The general information provided about City of Kent's nearby and adjacent well fields is the basis for comments #2 thru #9 by City and the information will be mentioned in the proposed educational sign included in the proposed SEPA mitigation condition #8 below.
2) Request for adding a note to SWPPP for spill notification to City during construction.		Agree. Applicant will be required to add note as SEPA mitigation condition #1 requiring spill notification.
3) Request for adding a second note on drawings requiring notification to City for spill notification.		Agree. Applicant will be required to add note as SEPA mitigation condition #2 requiring spill notifications.
4) City requests clean source of fill for aggregates, adding a note to specifications.		Agree. The requirement for a legally permitted clean source of aggregate fill is a project technical specification requirement that is verified by inclusion as SEPA mitigation condition #3.
5) City requests using Best Management practices and reasonable technology for protecting groundwater with storm water system features.		Agree. Applicant will be required to add note as SEPA mitigation condition #4 for storm water technology and practices.
6) City requests native and drought tolerant plant material that avoids the need for fertilizer and amendments plus irrigation.		Agree. Applicant will be required to add note as SEPA mitigation condition #5 for native and drought tolerant plants.
7) City requests prohibition on fertilizers and pesticides.		Agree, subject to the exact wording of SEPA mitigation condition #6 terms creating certain reasonable exceptions for initial establishment phase of plants plus special emergency and public health safety circumstances where pesticides might be required. City of Kent does not unreasonably strictly prohibit pesticides or fertilizer elsewhere in close proximity to similar wellheads within Zones 1 or 2. One nearby obvious example is most of Covington and Maple Valley urban development near existing similar well heads along SR-169 and SR-516 corridors. A strict prohibition as a SEPA mitigation condition would preclude a reasonable use for initial plant establishment for fertilizer plus foreseeable instances when state agencies or

		King County or a disaster response official might determine necessary in the future for pesticides, or the possibility of a future discontinued wellhead production at the locations mentioned. All three concerns can be addressed by including a few exceptions plus “shall endeavor” instead of “shall prohibit” as a reasonable and practical SEPA response by KC Parks to implement applicable aquifer protection provisions.
8) City requires excellent inspection and maintenance records for servicing the filter cartridge units required.		Agree. Applicant will be required to add note as SEPA mitigation condition #7, encouraging records on changing filters.
9) City requires educational signage about Rock Creek watershed and municipal water supply as part of project design.		Agree. Applicant will be required to add note as SEPA mitigation condition #8, requiring an educational site sign about the watershed.

END OF SECOND PUBLIC COMMENT PERIOD ENDING in May, 2013